1 The Honorable Robert S. Lasnik 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 UNITED STATES OF AMERICA, NO. CR22-106-RSL 10 Plaintiff, 11 12 PROTECTIVE ORDER v. 13 ABINET ONKISO, 14 Defendant. 15

This matter, having come to the Court's attention on the Unopposed Motion for Protective Order, and the Court, having considered the entirety of the record and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Definition of Protected Material

The investigation in this case focused on Mr. Onkiso's conduct as a tax preparer, so the discovery contains numerous individuals' tax-related information, other financial information, and personally identifiable information. This investigation also involved the use of an undercover officer ("UC"), and sensitive information regarding the UC is contained in the discovery materials. If distributed outside of the defense attorneys of record, and investigators, paralegals, law clerks, experts and assistants for the defense attorneys of record (hereinafter collectively referred to as members of the defense team), this information could subject the UC to harassment, retaliation, or tampering, and could

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interfere with current investigations where the UC is being used. The tax-related information and other financial information described herein and the information relating to the UC are collectively referred to as "Protected Material."

2. Permissible Disclosure of Protected Material.

The United States will make available copies of the Protected Material to defense counsel to comply with the government's discovery obligations. Possession of the Protected Material is limited to defense counsel, as well as his investigators, paralegals, assistants, law clerks, and experts (hereinafter collectively referred to as "members of the defense team"). Defense counsel may provide a copy of the Protected Material to Mr. Onkiso so that he may view the material, but Mr. Onkiso may not disseminate Protected Material outside of members of the defense team.

Members of the defense team may not provide copies of the Protected Material to other persons. Defense counsel is required to provide a copy of this Protective Order to members of the defense team, including Mr. Onkiso, and to obtain written consent from members of the defense team of their acknowledgment to be bound by the terms and conditions of this Protective Order, prior to providing any Protected Material to the members of the defense team. The written consent need not be disclosed or produced to the United States unless requested by the Assistant United States Attorney and ordered by the Court.

This order does not limit employees of the United States Attorney's Office for the Western District of Washington from disclosing the Protected Material to members of the United States Attorney's Office, federal law enforcement agencies, and to the Court and defense as necessary to comply with the government's discovery obligations.

3. <u>Filing</u>

Any Protected Material that is filed with the Court in connection with pretrial motions, trial, or other matters before this Court, shall be filed under seal and shall remain sealed until otherwise ordered by this Court.

1 4. Nontermination 2 The provisions of this Order shall not terminate at the conclusion of this prosecution. 3 Furthermore, at the close of this case, defense counsel shall return the Protected Material, 4 including all copies of the Protected Material, to the office of the United States Attorney, 5 or otherwise certify that the material has been destroyed. Notwithstanding the above, 6 defense counsel may keep one digital copy of the Protected Material in its files. That digital 7 copy must be kept in a locked facility with access restricted only to members of the defense 8 team who have agreed to be bound by provisions of this Protective Order. 9 5. Violation of Any Terms of this Order Any person who willfully violates this order may be held in contempt of court and 10 may be subject to monetary or other sanctions as deemed appropriate by this Court. 11 12 13 DATED this 10th day of August, 2022. 14 15 MMS Casnik 16 17 Robert S. Lasnik United States District Judge 18 19 20 21 22 23 24 25 26 27

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